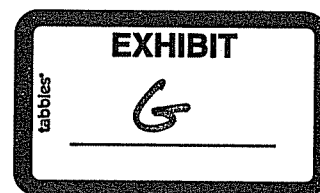


**AFFIDAVIT
OF
KENNETH MARK SHANE
296 Maple Drive
Cortland, Ohio 44410**

I commenced work with Lexington Connector Seals on March 28, 1998 and was employed as an Engineering Manager in charge of all incoming tooling proto-type and production which included process engineering, plant facilities, maintenance

My position was parallel to that of Lorraine Cerimele. My department and Lorraine Cerimele's department supported production. I resigned from Lexington on May 28, 1999. I resigned because of Keith Blockinger's poor management skills; also the way some of the people were mistreated, not only in my department but in other departments, and also the way I felt I was being managed or lack of management. Actually there was no management at all. I was never directed. I was told at all times that I was doing a great, good, phenomenal job and then when it came down to "crunch" time it was thrown in my face that--engineering was going in the wrong direction. I got phenomenal raises: an \$8,000 raise, a \$2,000, raise and an \$18,000 bonus. I was very confused by it.

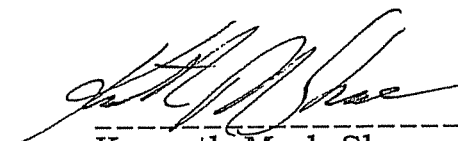
On several occasions I was asked to let proto-type and production tooling slide through as far as dimensionals or steel verifications or dimensional checks. I was asked through the president of the company, Keith Blockinger, to basically approve those tools. Lorraine's performance viewed very high by Keith Blockinger, at least every time that Keith was ever discussing Lorraine with me. In fact on several occasions he's actually said in fact around the time of Lorraine's dismissal some of Keith Blockinger's exact words are "Lorraine's doing a great job". In fact I've actually over heard Keith say to me about giving Lorraine time off as far as extra vacation time for her good work with a certain customer AMP. Also, I have never once heard Keith Blockinger talk bad about Lorraine's performance, in fact I think that I've always heard very, very high remarks about Lorraine's performance from Keith and everybody in the plant. I think Lorraine was probably the person that held the company together the most. There's been several times when Keith Blockinger asked Lorraine Cerimele in my presence to fabricate data to make the paperwork more appealing to the customer or to



just get the job approved. That happened on more than three or four occasions. She was asked to really change dimensions instead of just fudging the data. I think the word I was looking for was change dimensions or to doctor or make numbers look more appealing to what the actual part print would call for in order to bring things into specification. Keith Blockinger's words to me pertaining to Lorraine's loyalty to Lexington Connector Seals was put in a manner of my interpreting the loyalty as meaning a termination for her or anybody that has contact with Lorraine that does not cooperate to do improprieties with Lexington's customer's as suggested by Blockinger. *AN EMPLOYEE* said to me "if this Lorraine things ends up in court you have to be loyal to the Company." I asked "what are you saying?" *A* responded "you have to defend the Company regardless of the facts." *THIS EMPLOYEE'S*

Referring back to the statement earlier about information that Lorraine or myself was asked to doctor or fudge or change specifications, one of the locations happened at the Avalon Inn or the Tavern by the Green. That particular time was for the AMP 104 way cable seal. On several occasions, and I'm talking about maybe 10-15 different times, I was told to let go of one of my employees in the engineering department by Keith Blockinger. One week it was keep 'em--the next week it was fire 'em and I'm talking about it going on for several months. It was fire, keep, fire, keep and this went on for a period of about six months. All this was documented in the engineering file for this one employee but at the end when Keith Blockinger was confronted about his actions as far as terminating this employee he had no recollection of it. I was the one that was put on the spot as far as terminating this employee.

W.S.



Kenneth Mark Shane

STATE OF OHIO)
) ss.
TRUMBULL COUNTY)

Before me a notary public in and for the above state and county this
28th day of September, 1999, personally appeared Kenneth Mark
Shane who on his oath did state that the foregoing affidavit is true as he
verily believes.



NOTARY PUBLIC

DIANNA R. MULLEN
Notary Public, State of Ohio
My Commission expires 1/29/03